

**IN THE UNITED STATES BANKRTUPCY COURT  
FOR THE DISTRICT OF DELAWARE**

In Re:	)	Chapter 11
	)	
W. R. Grace & Co., <u>et al.</u> ,	)	Case No. 01-01139 (JKF)
	)	Jointly Administered
	)	
Debtors.	)	<b>Related to Docket Nos. 16259 and 16597</b>
	)	
	)	Objection Deadline: September 7, 2007
_____	)	Hearing Date: September 24, 2007 at 2:00 p.m.

**CERTIFICATION OF COUNSEL REGARDING AGREED  
SUPPLEMENTAL ORDER REGARDING MODIFIED ORDER  
ESTABLISHING THE NON-WAIVER OF PRIVILEGES CONTAINED IN  
ANSWERS TO THE DEBTORS' INTERROGATORIES AND THE  
SEALING AND CONFIDENTIALITY OF SUCH ANSWERS**

The undersigned hereby certifies that:

1. On August 20, 2007, the Official Committee of Unsecured Creditors filed the Motion to Alter and Amend the Court's Modified Order Establishing the Non-Waiver of Privileges Contained in Answers [Docket No. 16597] (the "Motion to Amend").

2. No objections were filed to the Motion to Amend. Counsel from Stutzman, Bromberg, Esserman & Plifka ("Stutzman Bromberg") and from Montgomery, McCracken, Walker & Rhoads, LLP ("Montgomery McCracken") however contacted the undersigned raising certain issues with respect to the relief sought in the Motion to Amend.

3. Counsel from Stutzman Bromberg and Montgomery McCracken and the undersigned have conferred and all issues raised with respect to the Motion to Amend have been resolved.

4. Attached as Exhibit A is the Agreed Supplemental Order Regarding Modified Order Establishing The Non-Waiver of Privileges Contained in Answers to the Debtors' Interrogatories And The Sealing and Confidentiality of Such Answers (the "Agreed

Supplemental Order”) that has been agreed to by Stutzman Bromberg and Montgomery McCracken on behalf of the firms identified in footnote 1 of the Agreed Supplemental Order. Also attached as Exhibit B is the agreed form of Confidentiality Rider to be executed by Non-PI Committee estimation experts in satisfying the provisions of paragraph 1 of the Agreed Supplemental Order.

5. The Creditors’ Committee respectfully requests that the Court enter the Agreed Supplemental Order attached at Exhibit A at its earliest convenience.

Dated: September 12, 2007

Respectfully submitted,

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